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17 TRIFECTA MARKETING GROUP, LLC

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 JESSICA LEE, individually and on behalf of a  
21 class of similarly situated individuals,

22 Plaintiff,

23 v.

24 STONEBRIDGE LIFE INSURANCE  
COMPANY, a Vermont corporation, and  
25 TRIFECTA MARKETING GROUP, LLC, a  
26 Florida limited liability company,

27 Defendants.  
28

Case No. CV 11-0043-RS

**STIPULATION TO RESET  
SETTLEMENT CONFERENCE DATE**

Judge: Hon. Richard Seeborg  
Magistrate: Hon. Joseph C. Spero

1 Pursuant to Local Rule 6-2, Plaintiff Jessica Lee, Defendant Stonebridge Life Insurance  
2 Company (“Stonebridge”), and Defendant Trifecta Marketing Group, LLC (“Trifecta”) (collectively  
3 referred to herein as the “Parties”), by and through their respective counsel of record, hereby  
4 stipulate to move the date currently set for the settlement conference in this case as set forth below:

5 WHEREAS, Plaintiff filed the Complaint in this case on January 4, 2011 (Dkt. 1.);

6 WHEREAS, the Plaintiff and Stonebridge agreed to participate in, and the Court ordered, a  
7 settlement conference in front of Hon. Joseph C. Spero (Dkt. 25.);

8 WHEREAS, the Plaintiff and Stonebridge thereafter concluded that the settlement  
9 conference would not be productive without completing certain discovery and the inclusion of then  
10 third-party Trifecta;

11 WHEREAS, on July 28, 2011, Plaintiff filed her First Amended Class Action Complaint  
12 naming Trifecta as an additional Defendant (Dkt. 34.);

13 WHEREAS, on September 26, 2011, Stonebridge filed its Answer to the Amended  
14 Complaint (Dkt. 40);

15 WHEREAS, on December 12, 2011, Trifecta filed its Answer to the Amended Complaint  
16 (Dkt. 44)

17 WHEREAS, this is the Parties’ first request to continue the date of the settlement conference  
18 since Trifecta’s appearance in this case (Plaintiff and Stonebridge’s fourth request since the  
19 inception of the case and the first request from Trifecta), (Dkts. 29, 36, & 41.);

20 WHEREAS, counsel for the Parties have actively discussed their current positions about  
21 settlement and have determined that proceeding with the settlement conference as scheduled on  
22 February 14, 2012, would not be an efficient use of the Parties’ or the Court’s resources given their  
23 respective views regarding settlement;

24 WHEREAS, the Parties believe that a settlement conference or other ADR method may be  
25 more productive if the Parties continue with discovery;

26 WHEREAS, the stipulated continuance of the settlement conference will not alter the date of  
27 any other deadlines in the schedule for the case; and  
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1 WHEREAS, the Parties have informed the Court via telephone of their request to reset the  
2 date of the settlement conference, and the Court has indicated that June 6, 2012 is an available date.

3 Pursuant to L.R. 6-2, IT IS HEREBY STIPULATED AND AGREED by the Parties, through  
4 their counsel, that, with the Court's agreement, the settlement conference be reset from February 14,  
5 2012 to June 6, 2012.

6 Confidential settlement conference statements shall be due by May 23, 2012 - JCS  
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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: February 3, 2012

EDELSON MCGUIRE, LLC

By /s/ Ryan D. Andrews  
RYAN D. ANDREWS  
Attorney for  
Plaintiff JESSICA LEE

Dated: February 3, 2012

MORRISON & FOERSTER, LLP

By /s/ Tiffany Cheung  
TIFFANY CHEUNG  
Attorney for  
Defendant STONEBRIDGE LIFE INSURANCE  
COMPANY

Dated: February 3, 2012

LAW OFFICES OF STUART D. KIRCHICK

By /s/ Stuart D. Kirchick  
STUART D. KIRCHICK  
Attorney for  
Defendant TRIFECTA MARKETING GROUP, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: Feb. 6, 2012

JOSEPH C. SPERO  
UNITED STATES JUDGE

